

THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF
WASHINGTON AT TACOMA

In re:
KATHLEEN D. MCGOWAN
Debtor(s).

CASE No. 13-40666
Request for Extension and
Preliminary
Response to Motion to Sell
Redemption Rights

TO THE HONORABLE BRIAN D. LYNCH AND TRUSTEE WALDREN:

I (Kathleen D. McGowan) will be out of the country from October 12, 2013 through October 19, 2013. I request an extension in order to hire new counsel, bring new counsel up to date on the specifics of my case, and gather all of the necessary documents to defend my position.

I was informed by prior counsel that my case was over July 24, 2013, that I would have one year to move my belongings out of the home I have lived in since 2001. When prior counsel filed to withdraw I was informed again September 25th, the day I showed for the hearing that did not take place, that my case was over, that prior counsel' motion to withdraw was a formality and that my case just had to go through state court. Now I have no attorney and new motions filed by the trustee two months later take me by surprise and I fell ambushed.

I strongly object to and oppose the motion to Sell Redemption Rights to my condominium.

I have been in loan modification negotiations with CitiMortgage.

The VBTS Association owes me refunds plus interest for money paid out of pocket with the promise to reimburse me for; Home owners insurance deductible for damage to the exterior of my condo, for many exterior repairs performed by me and exterior repairs paid for by me (receipts and documents to be submitted at the hearing). VBTS obtained \$32,344.81 that I paid to the Thurston County Court registry 4/2/2010.

Additionally, the Trustee recently informed prior counsel that the condominium was valued much higher on Zillow (currently valued at \$367,000 http://www.zillow.com/homes/7047-Cooper-Point-rd-nw-98502_rb/). Home values in Thurston County continue to rise, recovery from the 2008 real-estate crash and recession is slowly returning value to the housing market across the country. All parties (except the trustee) would benefit in waiting for the value to increase.

Moreover, the current decreased value of the condo is the direct result of deferred maintenance by the VBTS Association board (Thurston County Assessors reports to be submitted at the hearing).

DATED this 11th day of October, 2013

/s/Kathleen D. McGowan
Kathleen D. McGowan (pro se)
Please excuse any procedural mistakes.

Certificate of Service

Case No. 13-40666 all parties listed below have received a copy via email:

Mark D. Waldron
6711 Regents Blvd W
Tacoma, WA 98466
Trustee@orlandini-waldron.com

United States Trustee
700 Stewart St Ste 5103
Seattle, WA 98101
USTPRegion18.SE.ECF@usdoj.gov

I declare under penalty of perjury of the laws of the state of Washington that on October 11, 2013, I caused to be served via email a true and accurate copy of the following: CASE No. 13-40666 Request for Extension and Preliminary Response to Motion to Sell Redemption Rights

[/s/Kathleen D. McGowan](#)
Kathleen D. McGowan (pro se)
kdmcgowan@outlook.com